

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W.R. GRACE & CO., *et al.*,) Case No. 01-1139 (JKF)
) Jointly Administered
)
Debtors.) Re: Docket Nos. 12858, 14079
) 2/26/07 Agenda Item No. 16

**CERTIFICATION OF COUNSEL REGARDING ORDER
AMENDING CASE MANAGEMENT ORDER FOR THE ESTIMATION
OF ASBESTOS PERSONAL INJURY LIABILITIES**

1. On December 19, 2006, the Court entered the Order Regarding Case Management Order for the Estimation of Asbestos Personal Injury Liabilities (Docket No. 14079) which set various deadlines and trial dates.
2. On February 26 2007, at the Debtors request, the Court re-set the trial dates for the Estimation of Asbestos Personal Injury Liabilities. As a result, the Debtors and the Official Committees appointed in these cases and the Future Claimants Representative, have negotiated new dates and deadlines with respect to the matter. The new Amended Case Management Order for the Estimation of Asbestos Personal Injury Liabilities ("Amended PI CMO") negotiated among the parties is attached hereto.

3. The Official Committee of Asbestos Personal Injury Claimants ("ACC") and David T. Austern, the Future Claimants' Representative ("FCR"), agree to the dates and schedule set forth in the attached Amended PI CMO with the exception of the inclusion of the briefing and argument schedule relating to the Debtors' contemplated Motions regarding the X-Ray Order, the Supplemental X-ray Order and the Consulting Expert Order (the "Motions"). However, the ACC and FCR do not object to the Debtors' selection of the dates for briefing and argument relating to the Motions as set forth in the attached Amended PI CMO.

4. The ACC and FCR also reserve the right to raise before the Court at the next available hearing date the issue of the nature, form and content of the "navigable database" referred to in the attached Amended PI CMO and to seek appropriate relief with respect thereto, including without limitation, seeking the production of the Questionnaire related work performed for the Debtors and/or their experts by the Delaware Claims Processing Facility or other entity referred to by the Debtors in their presentation to the Court on February 26, 2007

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5. Accordingly, the Debtors respectfully request that the Court enter the Amended PI CMO.

Dated: March 13, 2006

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